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Via Hand Delivery and ECF

July 1, 2014

Honorable Robert E. Gerber
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)

**Letter regarding July 2, 2014 Status Conference
pursuant to May 16, 2014 Scheduling Order**

Dear Judge Gerber:

This firm is bankruptcy co-counsel with (1) Kessler Topaz Meltzer & Check, LLP and the Miller Law Firm, PC, attorneys for the proposed lead plaintiff and the Class in the matter entitled Peggy Sue Jones, Individually and on Behalf of All Others Similarly Situated v. General Motors, LLC, Case No. 2:14-cv-11197-GAD-DRG (E.D. Mich.); and (2) Robbins Geller Rudman & Dowd, LLP and Paradis Law Group, PLLC, attorneys for the proposed lead plaintiff and the Class in the matter entitled Larry Darby, Individually and on Behalf of All Others Similarly Situated v. General Motors, LLC and Delphi Automotive PLLC, Case No. 5:14-cv-00676 (C.D. Cal.) (collectively, the **“Proposed Lead Plaintiffs”**). These actions are now subject to the order of the Panel on Multidistrict Litigation in MDL No. 2543 dated June 9, 2014 (the “MDL Transfer Order”).

We write with respect to the *Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. sections 105 and 363 to Enforce the Court’s July 5, 2009 Sale order and Injunction, (II) Objection filed by Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929* [Doc. 12697, the **“Scheduling Order”**]. Specifically, pursuant to the penultimate paragraph of the Scheduling Order, we indicate our desire to reserve our right to potentially be heard at tomorrow’s conference. As to the points we will wish to make, it is difficult to assess at this time since we are advised that extensions of the various deadlines set forth in paragraph 2 of the Scheduling Order will be requested and we are unclear as to what exactly will be requested with respect to paragraphs 3 and 6 of the Scheduling Order. We are aware of a proposed order that may be presented to the Court regarding some or all of the matters set forth in the Scheduling Order and are concerned about what threshold issues will be or won’t be going forward as well as the extent of discovery that may be required depending upon the scope of the stipulated facts which appear to remain very much a work in progress.

**Lowenstein
Sandler** LLP

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We will, of course, do our best not to duplicate positions advanced by Designated Counsel but, given the uncertain state of play, wish to reserve our right to be heard as necessary at the July 2, 2014 conference.

Respectfully,



Michael S. Etkin

MSE/cbs

cc: (by email)

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